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October 31, 2024

Via ECF

The Hon. Michael A. Shipp
United States District Judge
United States District Court
District of New Jersey
Clarkson S. Fisher Federal Building and
United States Courthouse
402 East State Street
Trenton, New Jersey 08608

Re: United States v. Travores Wills
Docket No. 3:20-CR-00839 (MAS)
**Unopposed Motion for an Order
Extending Surrender Date to
After January 1, 2025**

Dear Judge Shipp:

This firm represents Mr. Travores Wills ("Wills"), a defendant in this matter. Please accept this letter in lieu of a more formal motion for an order extending Wills's surrender date to after January 1, 2025.

Wills appeared before the Court for sentencing on October 10, 2024. At that hearing, the Court sentenced him to a custodial term of 46 months. We recently received notice that Wills must surrender at Talladega SCP in Talladega, Alabama, before noon on November 19, 2024.

The reasons for the requested extension are as follows. First, Wills's son, Tacaris Hayward, will be graduating from college on December 14, 2024. A true and

accurate copy of the invitation that Wills received for the graduation ceremony is annexed hereto as EXHIBIT A. Wills would like to be present for this event, which celebrates a significant achievement for his son.

Further, and as was noted in the defense sentencing memo previously submitted to the Court, Wills is a caregiver for his elderly aunt. He has been working diligently since the sentencing hearing to make alternatively care arrangements for her for the period of his imprisonment. Thus far, he has been unable to so, and requires additional time to make these arrangements prior to his surrender date.

As has already been established, Wills is not a flight risk. He appeared before the Court for all hearings, and maintained contact at all times with his attorneys while this matter was pending. Accordingly, there are no events in the history of this case which suggest that Wills will not appear for voluntary surrender on any adjourned surrender date.

We have discussed this matter with AUSA Rebecca Yuan who represented the Government in this matter, and have been authorized to represent that the Government consents to the relief sought herein.

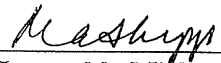
Against this backdrop, we respectfully submit that good cause exists for a grant of the relief sought herein, and request that the Court grant this Motion.

Please direct a member of your Honor's staff to contact me with any questions. Thank you for your ongoing attention to this case.

Respectfully submitted,
Counsel to Defendant,
TRAVORES WILLS

The Court hereby GRANTS a 60-day extension JAMES S. FRIEDMAN, LLC
for the Defendant's self-surrender date.

So Ordered this 31st day of October 2024


Honorable Michael A. Shipp, U.S.D.J.

By: /s/James S. Friedman
James S. Friedman, Esq.

-and-

DUMMIER & YOUNG LLC

By: /s/Jeffrey Dummier
Jeffrey Dummier, Esq.

cc: AUSA Rebecca Yuan (Via ECF)